



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE ASSOCIATED PRESS,

Plaintiff,

v.

MOREOVER TECHNOLOGIES, INC., and
VERISIGN, INC.,

Defendants.

07 CIV 8699 (GBD)

STIPULATION AND ORDER

Defendants VeriSign, Inc. and Moreover Technologies, Inc. (collectively
"Defendants") and plaintiff The Associated Press ("Plaintiff"), through their respective
counsel of record, hereby stipulate and agree as follows:

WHEREAS, the parties previously sought and received an extension from the Court,
so ordered October 26, 2007, that provided the Defendants with additional time to respond
to the Complaint;

WHEREAS, on November 7, 2007, Defendants filed a Motion to Dismiss the
Complaint (the "Motion to Dismiss");

WHEREAS, pursuant to the so ordered Stipulation of October 26, 2007, Plaintiff's
response to the Motion to Dismiss was due on December 3, 2007;

WHEREAS, the parties sought an extension from the Court, so ordered November
27, 2007, to permit Plaintiff to file its response to the Motion to Dismiss by December 10,
2007;

WHEREAS, the parties sought a second extension from the Court, so ordered
December 10, 2007, to permit Plaintiff to file its response to the Motion to Dismiss by
December 21, 2007, and to permit Defendants to file their reply, if any, by January 11,
2008;

WHEREAS, the Court by Order dated October 11, 2007, scheduled an initial conference for January 9, 2008, at 9:30 a.m.;

WHEREAS, the parties sought a third extension from the Court, so ordered December 20, 2007, to permit Plaintiff to file its response to the Motion to Dismiss by January 25, 2008, to permit Defendants to file their reply, if any, by February 4, 2008, and to adjourn the initial conference to February 27, 2008, at 9:30 a.m.;

WHEREAS, the parties sought a fourth extension from the Court, so ordered January 23, 2008, to permit Plaintiff to file its response to the Motion to Dismiss by February 28, 2008, to permit Defendants to file their reply, if any, by March 11, 2008, and to adjourn the initial conference to April 2, 2008, at 10:00 a.m.;

WHEREAS, the parties sought a fifth extension from the Court, so ordered February 25, 2008, to permit Plaintiff to file its response to the Motion to Dismiss by March 31, 2008, to permit Defendants to file their reply, if any, by April 14, 2008, and to adjourn the initial conference to May 7, 2008 at 9:30 a.m.;

WHEREAS, the parties sought a sixth extension from the Court, so ordered March 28, 2008, to permit Plaintiff to file its response to the Motion to Dismiss by May 19, 2008, to permit Defendants to file their reply, if any, by June 2, 2008, and to adjourn the initial conference to June 24, 2008 at 10:30 a.m.;

WHEREAS, the parties now seek to further extend the dates by which Plaintiff's response and Defendants' reply shall be filed; and

WHEREAS, the parties now seek to further adjourn the initial conference.

NOW, THEREFORE, the parties stipulate and agree as follows:

1 The time for Plaintiff to file its response to the Motion to Dismiss is hereby extended to and including August 15, 2008

2. Defendants shall file their reply, if any, on or before August 29, 2008.

3. The initial conference shall be adjourned to September 24, 2008, at ____:____
____.m. By no later than September 17, 2008, the parties shall (a) submit a proposed case management plan and scheduling order to the Court, or (b) advise the Court that they have not been able to reach an agreement on a proposed case management plan and scheduling order.

Dated: May 13, 2008

ARNOLD & PORTER LLP
JAMES B. SWIRE
LOUIS S. EDERER
ELEANOR M. LACKMAN
399 Park Avenue
New York, New York 10022-4690
(212) 715-1000

ARNOLD & PORTER LLP
RONALD L. JOHNSTON
SEAN MORRIS
777 S. Figueroa Street, Suite 4400
Los Angeles, CA 90017
(213) 243-4000

By: Sean Morris
SEAN MORRIS
Attorneys for Defendants
VeriSign, Inc. and Moreover Technologies, Inc.

Dated: May 13, 2008

BINGHAM McCUTCHEN LLP
EDWARD F. MALUF
JOSEPH J. BARKER
399 Park Avenue
New York, New York 10022
(212) 705-7000

By: Joseph J. Barker
JOSEPH J. BARKER
Attorneys for Plaintiff
The Associated Press

SO ORDERED, this 15 day of May, 2008

George B. Daniels
U.S.D.J.

HON. GEORGE B. DANIELS

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